



**3. Fact Discovery – Interim Deadlines.**

- a. All requests for production of documents and interrogatories must be served by August 1, 2006.
- b. All requests for admission must be served by August 1, 2006.
- c. All depositions, other than expert depositions, must be completed by September 30, 2006.

**4. Fact Discovery – Final Deadline.** All discovery, other than expert discovery, must be completed by September 30, 2006.

**5. Status Conference.** A status conference will be held on June 2006.

**6. Expert Discovery.**

- a. Plaintiffs' trial expert must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by October 1, 2006.
- b. Plaintiffs' trial experts must be deposed by February 1, 2007.
- c. Defendants' trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by November 30, 2006.
- d. Defendants' trial experts must be deposed by February 1, 2007.

**7. Dispositive Motions.**

- 1. Dispositive motions, such as motions for summary judgment or partial summary judgment and motions for judgment on the pleadings, must be filed by February 1, 2007.
- 2. Oppositions to dispositive motions must be filed within 30 days after service of the motion.

**8. Pretrial Conference.** A pretrial conference will be held in May 2007.

Please be advised the above-referenced dates have been agreed upon by all parties.

RESPECTFULLY SUBMITTED,  
THE PLAINTIFFS,

BY THEIR ATTORNEY,

/s/ David W. Suchecki  
ELIZABETH N. MULVEY  
DAVID W. SUCHECKI  
CROWE AND MULVEY, L.L.P.  
141 TREMONT STREET  
BOSTON, MA 02111  
(617) 426-6006

RESPECTFULLY SUBMITTED,  
DEFENDANTS KENNETH K. GERWECK,  
M.D. AND SANDRA L. SALERNO, R.N.,

BY THEIR ATTORNEY,

/s/ Heather G. Beattie  
HEATHER G. BEATTIE  
MORRISON, MAHONEY, LLP  
1500 MAIN STREET  
P.O. BOX 15387  
SPRINGFIELD, MA 01115-5387  
(413) 737-4373

RESPECTFULLY SUBMITTED,  
DEFENDANTS  
UNITED STATES OF AMERICA,

BY ITS ATTORNEY,

MICHAEL J. SULLIVAN,  
United States Attorney

/s/ Gina Walcott-Torres  
Gina Y. Walcott-Torres  
Assistant U.S. Attorney  
John Joseph Moakley U.S. Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3369

**CERTIFICATE OF SERVICE**

I, David W. Suchecki, hereby state that on Friday, June 10, 2005, I served a copy of the following:

**AMENDED JOINT STATEMENT OF PARTIES FOR SCHEDULING CONFERENCE**

on the defendant(s), via electronic mailing, addressed to the following parties of interest:

Gina Walcott-Torres  
Assistant U.S. Attorney  
U.S. Department of Justice  
John Joseph Moakley United States Courthouse  
1 Courthouse Way, Suite 9200  
Boston, MA 02210

Attorney, Heather G. Beattie  
Morrison, Mahoney, LLP  
1500 Main Street  
P.O. Box 15387  
Springfield, MA 01115-5387

/s/ David W. Suchecki  
David W. Suchecki